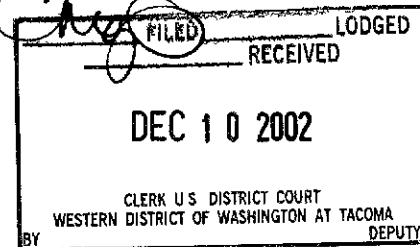


THE HONORABLE RONALD B. LEIGHTON



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

TANYA C. HAYNES,

Plaintiff,

v

MUNOZ REGIMBAL and ASSOCIATES, dba
INTERNAL MEDICINE NORTHWEST, and
DOES 1-3, inclusive,

Defendants

NO C02-5455(RJB)RBL

DEFENDANTS' INITIAL
DISCLOSURES PURSUANT TO
FED R CIV P 26(a)

Defendants make their initial disclosures to Plaintiffs pursuant to Fed R Civ Proc
26(a)(1)

1 Identities of Individuals Likely to Have Discoverable Information
(Fed R Civ P 26(a)(1)(A))

Defendants identify the following individuals who are likely to have discoverable
information relevant to disputed facts alleged with particularity in the pleadings. Defendants
reserve the right to add additional individuals, including without limitation any of those listed by
any other party to these proceedings, as may be appropriate and to supplement these disclosures
as additional information becomes available.

1 1 Linda Cantrell
825 East 60th
Tacoma, WA 98406

Ms. Cantrell is employed by Defendant Internal Medicine Northwest and possesses
testimonial knowledge of Ms. Haynes' employment at Internal Medicine Northwest, including
statements made by Ms. Haynes' that she intended to return to work at Internal Medicine
Northwest on a part-time basis following her maternity leave so she could attend college using
scholarship funds. Ms. Cantrell also possesses testimonial knowledge of Defendants' reliance on
Ms. Haynes' statements of returning to work on a part-time basis.

EISENHOWER & CARLSON, PLLC

3 PURSUANT TO

ORIGINAL

ATTORNEYS-AT LAW
1200 WELLS FARGO PLAZA
1201 PACIFIC AVENUE
TACOMA, WASHINGTON 98402
PHONE 253 572 4500
FAX 253 272-5732



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1 2 Karen Forbush
2 3115 North Bennett
3 Tacoma, WA 98407

4 Ms Forbush is employed by Defendant Internal Medicine Northwest and possesses
5 testimonial knowledge of Ms Haynes employment at Internal Medicine Northwest, including
6 statements made by Ms Haynes' that she intended to return to work at Internal Medicine
7 Northwest on a part-time basis following her maternity leave so she could attend college using
8 scholarship funds

9 1 3 Alycia Jimenez
10 1301 South Oakes
11 Tacoma, WA 98405

12 Ms Jimenez is employed by Defendant Internal Medicine Northwest and possesses
13 testimonial knowledge of statements made Ms Haynes early in her pregnancy that she intended
14 to return to work on a part-time basis so she could use scholarship funds to attend college
15 Specifically, Ms Jimenez possesses testimonial of Ms Haynes' stated intention to return to work
16 at Internal Medicine Northwest on a part-time basis after three months maternity so she could
17 attend college to become a registered nurse Ms Jimenez also possesses testimonial knowledge
18 of Internal Medicine Northwest's reliance on Ms Haynes' statements

19 1 4 Ruth Prins
20 8012 South K Street
21 Tacoma, WA 98408

22 Ms Prins is employed by Defendant Internal Medicine Northwest and possesses
23 testimonial knowledge of several statements made by Ms Haynes regarding her intention to
24 return to work on a part-time basis, or not at all, following her pregnancy leave so she could
25 attend college

26 1 5 Heather Stieferman
1921 208th Street East
Spanaway, WA 98387

Mr Stieferman possesses testimonial knowledge of statements made by Ms Haynes that
she intended to return to work from maternity leave on a part-time basis so she could attend
college Ms Stieferman also possesses testimonial knowledge that, prior to starting maternity
leave, Ms Haynes had already selected her college classes and determined which credits she
could be applied toward a nursing degree

1 6 Christina Young
30405 93rd Street East
Sumner, WA 98390

Ms Young is employed by Defendant Internal Medicine Northwest She possesses
testimonial knowledge of several statements made by Ms Haynes prior to starting maternity
leave that she intended to return from leave on a part-time basis to attend college for a nursing
degree

DEFENDANTS' INITIAL DISCLOSURES PURSUANT TO
FED R CIV P 26(a)

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1 7 Janice Brame
 2 1209 North Anderson
 3 Tacoma, WA 98406

4 Ms Brame is employed by Defendant Internal Medicine Northwest She possesses
 5 testimonial knowledge of statements made by Ms Haynes during Internal Medicine Northwest
 6 medical assistant meetings that she planned to return form maternity leave on a part-time basis to
 7 attend college to obtain a nursing degree

8 1 8 Defendant Tayna Hanyes

9 Ms Haynes possesses testimonial knowledge of her employment with Defendant Internal
 10 Medicine Northwest and her intention to return to work on a part-time basis to attend college
 11 following the expiration of her maternity leave

12 2 Description of Documents (Fed R Civ P 26(a)(1)(B))

13 Defendants identify below the following categories of documents, data compilations and
 14 tangible things in the possession, custody, or control of Defendants that are relevant to disputed
 15 facts alleged with particularity in the pleadings Unless otherwise indicated, copies of all of the
 16 items described below are located at the offices of Eisenhower & Carlson, PLLC, 1201 Pacific
 17 Avenue, Suite 1200, Tacoma, WA 98402 Defendants reserve the right to amend and
 18 supplement this list as additional information becomes available

- 19 2 1 Internal Medicine Northwest's personnel file for Tanya Haynes,
- 20 2 2 Washington State Employment Security Department – Claimant's
- 21 Separation Statement (with attachment),
- 22 2 3 May 21, 2002 letter from Janice Brame regarding Tanya Haynes return to
- 23 work date,
- 24 2 4 U S Equal Employment Opportunity Commission – Charge of
- 25 Discrimination,
- 26 2 5 U S Equal Employment Opportunity Commission – Notice of Charge of
- Discrimination,
- 2 6 U S Equal Employment Opportunity Commission – Dismissal and Notice
- of Rights

3 Computation of Damages Claimed (Fed R Civ P 26(a)(1)(C))

Does not apply

4 Insurance Agreement (Fed R Civ P 26(a)(1)(D))

None

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 FAX 253 272 5732

1 DATED this 6th day of December, 2002

2 EISENHOWER & CARLSON, PLLC

3
4 By.  27627
5 For Donald L. Anderson, WSBA # 8373
6 Attorneys for Defendants
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